

declarations by two experts and all four plaintiffs. Plaintiffs also filed the declaration of their counsel (Doc. 62) which includes twenty exhibits.

6. Defendants' deadline for responding to Plaintiffs' Motion for Summary Judgment is currently April 6, 2020. Defendants seek an extension of time through July 10, 2020. Defendants seek an extension of time to respond not for purposes of delay, but so that they can complete the necessary discovery to adequately prepare a response. At a minimum, Defendant will review the discovery responses received from new plaintiff Jaime Combs, depose all four plaintiffs, and depose the two experts disclosed by Plaintiffs. Without additional time, Defendants will not be able to respond adequately to Plaintiffs' motion.

7. Plaintiffs' counsel has advised that they "do not oppose a limited extension of say two weeks if necessary as a result of our new circumstances related to the COVID-19 pandemic. Plaintiffs oppose, however, the requested 13 and ½ week extension. " A two week extension, until approximately April 20, will not provide sufficient time to review the new plaintiff's discovery responses, depose all four plaintiffs, depose two expert witnesses and then prepare an adequate response. The logistics would be nearly impossible under the best of circumstances, and our current public health environment exacerbates the problem.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 18th day of March 2020.



DIANNA BAKER SHEW BPR 012793
Senior Assistant Attorney General
(615) 532-1969
dianna.shew@ag.tn.gov

Counsel for the Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March 2020 I filed the foregoing electronically through the Court's CM/ECF System and thereby served the following:

Gavin R. Villareal
Maddy Dwertman
BAKER BOTTS L.L.P.
98 San Jacinto Boulevard, Suite 1500
Austin, TX 78701-4078
Phone: (512) 322-2500
Facsimile: (512) 322-2501
gavin.villareal@bakerbotts.com
maddy.dwertman@bakerbotts.com

Brandt Thomas Roessler
BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112-4498
Phone (212) 408-2500
Facsimile: (212) 408-2501
brandt.roessler@bakerbotts.com

Kathryn S. Christopherson
BAKER BOTTS L.L.P.
1001 Page Mill Rd., Bldg. One, Suite 200
Palo Alto, CA 94304-1007
Phone: (650) 739-7500
Facsimile: (650) 739-7699
kathryn.christopherson@bakerbotts.com

Omar Gonzalez-Pagan
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.
120 Wall Street, 19th Floor
New York, NY 10005-3919
Telephone: (212) 809-8585
Facsimile: (212) 809-0055
ogonzalez-pagan@lambdalegal.org

Tara L. Borelli
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.
730 Peachtree Street NE, Suite 640
Atlanta, GA 30318-1210
Telephone: (404) 897-1880
Facsimile: (404) 897-1884
tborelli@lambdalegal.org

Sasha Buchert
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.
1776 K Street NW, Suite 722
Washington, DC 20006
Telephone: (202) 804-6245
sbuchert@lambdalegal.org

s/ Dianna Baker Shew
Dianna Baker Shew